

ALL ACTIONS.

1 This Stipulation is entered into by and among Lead Plaintiff the New York City Pension
2 Funds, defendants Juniper Networks, Inc. (“Juniper”), Scott Kriens, Pradeep Sindhu, Marcel Gani,
3 Robert M. Calderoni, Kenneth Goldman, William R. Hearst III, Stratton Sclavos, Vinod Khosla,
4 Kenneth Levy and William R. Stensrud, and defendant Ernst & Young, by and through their
5 respective attorneys of record.

6 WHEREAS, pursuant to the Court’s order dated November 20, 2006, Lead Plaintiff filed a
7 Consolidated Class Action Complaint on January 12, 2007, and Defendants have until March 12,
8 2007 within which to respond;

9 WHEREAS, on December 20, 2006, Juniper announced that it will restate its historical
10 financial statements to record additional non cash charges for stock-based compensation, and intends
11 to file restated financial statements during the first quarter of 2007 (*i.e.*, before March 31, 2007);

12 WHEREFORE, the parties hereby stipulate, and request the court to order, as follows:

13 1. Lead Plaintiff shall (a) file and serve an Amended Consolidated Class Action
14 Complaint (the “Amended Complaint”) within thirty (30) days after Juniper files its restated
15 financial statements with the Securities Exchange Commission or, (b) in the alternative, notify
16 Defendants by email if it decides not to file an Amended Complaint; and

17 2. Defendants shall file and serve their response(s) to the operative complaint within 45
18 days after (a) service of the Amended Complaint, or (b) receipt of email notification that Lead
19 Plaintiff will not file an Amended Complaint.

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7 *Local Counsel for Plaintiffs*

8 *I, Joni Ostler, am the ECF user whose ID and password are being used to file this*
9 *Stipulation and [Proposed] Order Regarding Filing of Amended Complaint and Briefing*
10 *Schedule. In compliance with General Order 45, X.B., I hereby attest that David M. Friedman*
11 *has concurred in this filing.*

12 DATED February 15, 2007

13 PETER A. WALD
14 PATRICK E. GIBBS
15 DAVID M. FRIEDMAN
16 VIVANN H. CHUI
17 LATHAM & WATKINS LLP

18 /s/ David M. Friedman
19 DAVID M. FRIEDMAN

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21 San Francisco, CA 94111
22 Telephone: 415-391-0600

23 *Counsel for Defendants Ernst & Young*

24 * * *

25 **ORDER**

26 PURSUANT TO STIPULATION, IT IS SO ORDERED.

27 DATED: 2/16/2007

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THE HONORABLE JAMES WARE
UNITED STATES DISTRICT JUDGE